


<div style="text-align: center;">  </div>		PROCEDURE NO. <u>HS601</u>
		DATE <u>November 3, 1995</u>
		SUPERSEDES <u>New</u>
		APPROVED <u>Steven L. Scott</u>
<div style="text-align: center;"> <b>STANDARD PROCEDURE</b> </div>		
SUBJECT <div style="text-align: center;">MEDICAL SURVEILLANCE</div>		

## 1.0 PURPOSE AND POLICY

### 1.1 Purpose

The medical surveillance program ensures that employees are physically fit to perform their assigned duties and that exposures to chemical and physical agents has not compromised their health. The medical surveillance program is designed to monitor the effectiveness of health and safety programs.

The medical surveillance program consists of baseline (initial), periodic (annual or biennial), special, exposure-specific examinations, and exit medical examinations. In addition to ensuring the fitness of workers for demanding assignments and tracking the effects of exposures, the medical surveillance program satisfies regulatory requirements.

### 1.2 Policy

It is the policy of EARTH TECH that each employee whose work assignments involves potential or actual exposure to harmful agents participate in a medical surveillance program.

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### 3.0 RESPONSIBILITY MATRIX

**3.1 Procedure Responsibility.** The Environmental Health and Safety Director is responsible for the issuance, revision, and maintenance of this procedure.

**3.2 Action/Approval Responsibilities.** The Responsibility Matrix is Attachment 1.

### 4.0 DEFINITIONS

**Light Duty.** Light Duty Work is defined as a temporary alternate job assignment other than the employee's normal duties, in response to physical activity restrictions established by an EARTH TECH contract physician or clinic.

**Medical Director.** The Medical Director is a physician, board certified in occupational medicine, employed by the Medical Services Contractor. The Medical Director manages the services provided by the Medical Services Contractor and provides guidance on medical matters to EARTH TECH.

**Medical Services Contractor.** The Medical Services Contractor manages all occupational medical services, including medical surveillance programs, substance abuse prevention programs, and care for workers with occupational injuries or illness.

**Physical Activity Restriction.** To prevent aggravation of an existing condition, the Medical Director recommends a physical activity restriction to limit exposure to a chemical or class of chemicals, such as hepatotoxins; a physical agent, such as temperatures above 26°C WBGT; or an activity, such as lifting in excess of 10 kg.

**Safety-Critical.** A task or position is designated as safety-critical when the task or position is such that malfeasance or incompetence would endanger the lives of others. Examples, but not a complete list, of positions that have been designated safety-critical by federal and state regulations are

- Drivers of commercial vehicles
- Workers on pipelines carrying fuels or toxic or corrosive substances
- Workers at nuclear power plants
- Operators of cranes of more than 6,000 pounds capacity
- Aircraft pilots

## **5.0 PROCEDURE**

### **5.1 Classes of Medical Examinations**

#### **5.1.1 Baseline/Preplacement/Preemployment**

The baseline medical examination is used to identify physical capabilities and medical limitations that may have an impact on the candidate's ability to perform in the position for which he/she is being considered and to provide a baseline against which periodic or project-specific monitoring can be compared. The baseline medical examination is used to determine the suitability of an existing employee for a new assignment (preplacement) or a candidate's suitability to be hired (preemployment).

#### **5.1.2 Periodic/Annual/Biennial**

The periodic medical examination is used to evaluate an employee's continued fitness for duty and to assess any impact occupational exposures may have on his/her health status. The periodic examination includes an update to the medical and work history, results of any occupational exposure assessments, and a detailed medical examination tailored to the job description.

The Medical Director determines the frequency of the periodic medical examinations based on regulatory requirements, the position held by the employee, and the level of exposures to physical, chemical and biological agents.

#### **5.1.3 Exposure/Activity/Project-Specific**

The exposure-specific examination consists of specific medical tests to assess the impact of occupational exposures associated with a specific activity or project. The Medical Director will require an exposure-specific examination when he/she has reason to believe occupational exposures are impacting or may be impacting the health of an employee, or when he/she receives a recommendation from the Regional EHS Manager. Clients may recommend exposure-specific examinations for persons working on their projects. A client recommendation for an exposure-specific examination will be forwarded to the Regional EHS Manager who will evaluate the request, and if appropriate, forward the recommendation to the Medical Director. The Medical Director will determine the frequency of the exposure-specific medical examinations for each individual employee designated to participate based on sound medical practice and regulatory requirements.

#### **5.1.4 Exit/Termination**

An exit medical examination is given when an employee leaves the medical surveillance program, either because of termination of employment with EARTH TECH or because of reassignment to a position not designated to participate in the medical surveillance program. The exit examination assesses any impact occupational exposures may have on his/her health status.

### **5.2 Participating Employees**

#### **5.2.1 Required Participation**

Participation in the medical surveillance program is required for employees who are or may be

- Exposed to substances at or above permissible exposure levels (PEL) for 30 or more days per year
- Required to wear a respirator for 30 or more days per year
- Exposed above PEL in accidents or emergency situations
- Working on sites covered by any of the following regulations:
  - 29 CFR 1910.120 Hazardous Waste Operations and Emergency Response
  - 29 CFR 1926.65 Hazardous Waste Operations and Emergency Response
  - 29 CFR 1926.62 Lead
  - 29 CFR 1926.1101 Asbestos
  - 29 CFR 1926.1118 Inorganic Arsenic
  - 29 CFR 1926.1127 Cadmium
  - 29 CFR 1926.1128 Benzene
- Driving a commercial vehicle
- Performing safety-critical tasks

#### **5.2.2 Directed Participation**

The Medical Director or the Corporate EHS Director may designate other employees to participate in a medical surveillance program with the concurrence of the other.

#### **5.2.3 Mandatory Participation**

All employees designated to participate in the medical surveillance program are required to do so as a condition of employment. Only employees who fall within the above listed categories will be included in the medical surveillance program.

### **5.3 Entry Into the Medical Surveillance Program**

#### **5.3.1 Manager**

Each Manager evaluates the duties of each employee and prospective employee reporting to him/her. If the duties meets the criteria for required participation in the medical surveillance program (see Section 5.1), then the employee must be enrolled in the medical surveillance program.

Candidates for positions which require medical surveillance may not be hired until satisfactory completion of the baseline (pre-employment) medical examination.

The Manager is responsible for providing the Medical Services Contractor with the following:

- Description of the employee's duties
- Description of actual and potential exposures to chemical, physical, and biological agents and results of measurements when available
- Description of personal protective equipment used or which may be used
- Information from previous examinations which may not be readily available.

#### **5.3.2 Employee**

When designated to participate in the medical surveillance program, the employee completes and signs the following documents:

- Medical and Work History Questionnaire
- Medical Records release form for medical records from previous examinations
- Medical Records release authorizing EARTH TECH to receive the results of the examination.

#### **5.3.3 Regional EHS Manager**

The Regional EHS Manager reviews employee assignments with Managers in his/her region to ensure all employee who should be participating in the medical surveillance program have been enrolled. The Regional EHS Manager provides such assistance as may be required to ensure all required information is provided to the Medical Director.

#### **5.3.4 Corporate EHS Director**

To ensure the appropriate medical examination and tests, the Corporate EHS Director provides the Medical Services Contractor with the following references:

- A copy of the medical program
- A copy of each regulation requiring the examination, including:
  - 29 CFR 1910.120 Hazardous Waste Operations and Emergency Response
  - 29 CFR 1926.65 Hazardous Waste Operations and Emergency Response
  - 29 CFR 1926.62 Lead
  - 29 CFR 1926.1101 Asbestos
  - 29 CFR 1926.1118 Inorganic Arsenic
  - 29 CFR 1926.1127 Cadmium
  - 29 CFR 1926.1128 Benzene
- Where appropriate, a copy of the corresponding state regulations

### **5.4 Scheduling Preemployment Medical Examination**

#### **5.4.1 Human Resources Representative**

The Human Resources Representative coordinating the hire will provide the candidate with a baseline medical and work history questionnaire and determine from the candidate the geographical preference for the medical examination. The Human Resources Representative will contact the Medical Services Contractor to obtain the name, address, telephone number and contact person of the contract medical clinic which best suits the geographic preference of the candidate. The Human Resources Representative will coordinate the scheduling of the examination and ensure the scheduling information is provided to the Medical Services Contractor.

#### **5.4.2 Hiring Manager**

The hiring Manager informs the candidate that the offer of employment is contingent on the candidate being physically and medically capable of performing the duties of the position for which he/she is being hired. The Manager may not make the final offer until the medical examination is successfully completed and the medical clearance certificate has been received.

#### **5.4.3. Regional EHS Manager**

The Regional EHS Manager provides such assistance as is necessary to ensure the job description for the position being filled adequately describes the physical, chemical, and biological stresses of the position, and the PPE used or which may be used, including respiratory protection. The Regional EHS Manager provides

all necessary assistance to ensure that required and appropriate information is provided with the request and authorization for medical examination.

The Regional EHS Manager provides assistance to the hiring Manager to interpret physical activity restrictions if such restrictions are noted on the medical clearance certificate.

## **5.5 Scheduling Periodic and Exposure-Specific Medical Examinations**

### **5.5.1 Medical Services Contractor**

The Medical Services Contractor provides notification to the employee 60 to 30 days before the periodic or exposure-specific medical examination is due. This notification is in the form of a letter or fax to the office of record.

The Medical Services Contractor provides notification of delinquent medical examinations to the Manager, the Regional EHS Manager, and the Corporate EHS Director.

### **5.5.2 Manager**

The Manager ensures the notification of examination due is forwarded to the employee in a timely way.

The Manager arranges the work assignment so that the employee is available to take the medical examination before the expiration of the medical clearance certificate.

The Manager removes the employee from the assignment if the employee has not completed the medical examination before the expiration of the medical clearance certificate.

### **5.5.3 Regional EHS Manager**

The Regional EHS Manager ensures that all exposure assessments appropriate to the employee have been appropriately annotated to show the applicability to the employee and forwarded to the Medical Services Contractor.

The Regional EHS Manager ensures employees on delinquent medical examination list have been removed from designated assignments.



## **5.6 Scheduling Exit Medical Examinations**

### **5.6.1 Human Resources Representative**

Upon notification of termination or impending termination, the Human Resources Representative notifies the Medical Services Contractor to arrange for exit medical examination. The Human Resources Representative ensures terminating and reassigned employees who decline the opportunity to take an exit medical examination sign the waiver.

### **5.6.2 Manager**

Upon notification of termination or reassignment, the Manager contacts the Human Resources Representative.

The Manager releases the terminating or reassigned employee from duties as necessary to complete the exit medical examination.

### **5.6.3 Regional EHS Manager**

The Regional EHS Manager provides such assistance as needed to ensure terminating and reassigned employees are offered the opportunity to take an exit medical examination.

## **5.7 Medical Records**

Medical records must be preserved and protected in accordance with 29 CFR 1910.20 for the duration of employment plus 30 years. Medical records contain information that is protected by the Privacy Act. To meet the obligations of preserving the medical records and protecting the information they contain, EARTH TECH has arranged for the Medical Services Contractor to manage the medical records.

### **5.7.1 Access to Records**

An employee or designated representative may request to review his/her medical and exposure records. Such a request must be in writing, and signed and dated. The Regional EHS Manager will forward the request to the Medical Services Contractor who will provide the employee with a copy of the medical record.

The Medical Services Contractor will supply the copy within 15 days after the request has been submitted by the employee or designated representative. If the copy cannot be supplied within the allotted time, a request for extension will be submitted to the cognizant OSHA office.

### **5.7.2 Quality Control and Quality Assurance**

The Medical Services Contractor performs quality control checks on all medical records to ensure examining physicians appropriately record the findings of the examination and tests.

The Corporate EHS Director has access to all medical records to perform quality assurance checks to ensure proper recording and preservation.

## **5.8 Reports**

### **5.8.1 Report of Examination**

The Medical Services Contractor provides the employee with a confidential report of findings of the examination and a medical clearance certificate. EARTH TECH recommends the employee preserve the medical clearance certificate in a safe place and carry copies of the medical clearance certificate to provide to project managers and clients.

The Medical Services Contractor provides Regional EHS Manager with a copy of the medical clearance certificate.

### **5.8.2 Examinations Due Report**

The Medical Services Contractor produces a list by organization code of employees due to be examined 30 to 60 days before the expiration of their medical clearance certificate. This list is provided to Regional EHS Managers. The Regional EHS Manager ensures each Manager is notified of the employees in his/her charge due examinations so that he/she can schedule appropriately.

The Medical Services Contractor notifies each employee by letter or fax to the office of record 60 to 30 days before the periodic or exposure-specific medical examination is due.

### **5.8.3 Delinquent Examinations Report**

The Medical Services Contractor distributes a report of delinquent medical examinations to the Manager, the Regional EHS Manager, and the Corporate EHS Director.

When an employee's name appears on the delinquent examination report for two consecutive months, the Corporate EHS Director in coordination with the Regional EHS Manager brings this to the attention of the Division Vice President for resolution.

#### **5.8.4. Physical Activity Restriction Report**

The Regional EHS Manager maintains a list of employees with physical activity restrictions. The Regional EHS Manager provides each Manager and Project/Location EHS Representative in his/her region with a list of the employees with physical activity restrictions assigned to to their project/location.

The Regional EHS Manager audits locations and projects from time to time to ensure employees with physical activity restrictions are not exceeding their limitations. Evidence of an employee exceeding his/her physical activity restriction is brought to the attention of the Department Manager and the employee's Manager/Supervisor for resolution.

#### **5.8.5 Annual Reports**

The Medical Services Contractor provides annual reports of utilization, medical trends, and statistical analyses. These reports are prepared to improve the service, reverse unfavorable trends, and reduce the cost of the medical surveillance program.

### **5.9 Cost Accounting**

The Medical Services Contractor submits invoices directly to Corporate Accounts Payable. Each examination and service provided is coded with the organization code of the employee examined or receiving the service. The cost of medical surveillance is borne by the organizations with employees participating in the program.

## **6.0 EXCEPTION PROVISIONS**

None permitted.

If an office elects not to use the Medical Services Contractor, the examination will be repeated by the Medical Services Contractor at additional cost to the organization.

## **7.0 CROSS REFERENCE**

HS603 Occupational Injury and Illness

## **8.0 ATTACHMENTS**

- Attachment 1: Responsibility Matrix
- Attachment 2: Medical Services Contractor
- Attachment 3: Form HSF601-F1 Authorization For Medical Examination
- Attachment 4: Form HSF601-F2 Notification of Physical Activity Restriction

### RESPONSIBILITY MATRIX

Action	Procedure Section	Employee	Manager	Project/ Location EHS Rep	Regional/ Division EHS Manager	Corporate EHS Manager
Determining applicability of medical surveillance program	5.3.1		X			
Enrolling in medical surveillance program	5.3	X	X		X	
Scheduling initial examination	5.4		X			
Scheduling periodic examinations	5.5	X				
Scheduling exit examination	5.6		X			
Responding to delinquent examinations	5.8.3	X	X		X	X
Advise Operations about Physical Activity Restriction	5.3.3			X	X	

**MEDICAL SERVICES CONTRACTOR**

**EMR, Inc.** (404) 455-0818  
4360 Chamblee Dunwoody Road, Suite 202 (800) 229-3674  
Atlanta, Georgia 30341 FAX (404) 457-1429

R. Burt Prater, MD Randall K. Hindman  
Chairman, CEO President

**DEDICATED EARTH TECH ACCOUNT TEAM**

MEDICAL DEPARTMENT

Elayne F. Theriault, MD  
Medical Director  
medical@emrinc.uucp.netcom.com

Gail K. Mastin, COHN Susan Vollett, RN  
Director, Medical Evaluation & Review Medical Review RN

ACCOUNT MANAGEMENT

Holly Beavor  
Account Management  
ext. 350  
acctg@emrinc.uucp.netcom.com

PRODUCTION SERVICES

Richard DeLuca, CIH Terijene "TJ" Wolff  
Vice President, Production Services Director, Client Services

Mary Blake  
Production Service Manager

EXPOSURE RECORDS MANAGEMENT

Rich DeLuca  
Director, Environmental Health and Safety Services

EARTH TECH TEAM

Marilyn Brooks  
Client Service Manager  
ext. 440  
team4@emrinc.uucp.netcom.com

Marcia Campbell  
Team Leader/Client Support  
ext. 314

MEDICAL FACILITY AND LABORATORY MANAGEMENT

Lura K. Atchley  
Director, Medical Network Services  
Clinic@emrinc.uucp.netcom.com

Evelyn Cuckler  
Medical Network Services Administrative Asst.

Kim Alcorn  
Medical Network Services Administrative Asst.

RECORDS MANAGEMENT

David Goodman  
Records Management

ACCOUNTING

Laurie Leimkuehler  
Staff Accountant

Sherie Dunagan  
Staff Accountant

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**NOTIFICATION OF  
PHYSICAL ACTIVITY RESTRICTION**

Employee Name	Employee SS No.	
Job Title	Dept/Sect.	Location

TO MANAGER/SUPERVISOR \_\_\_\_\_:

• ***Physical Activity Restriction***

The employee identified above has a medical condition for which the limitations described below are prescribed. Please ensure his/her work assignments are consistent with the limitation. If the limitations are inconsistent with his/her normal duties, please find a light duty work assignment.

- |                          |   |
|--------------------------|---|
| <input type="checkbox"/> | No reaching above shoulder                              |
| <input type="checkbox"/> | No pushing or pulling                                   |
| <input type="checkbox"/> | No climbing of stairs or ladders                        |
| <input type="checkbox"/> | No operating or working around moving machinery/driving |
| <input type="checkbox"/> | No lifting over _____ pounds                            |
| <input type="checkbox"/> | No repetitive waist bending                             |
| <input type="checkbox"/> | No kneeling or squatting                                |
| <input type="checkbox"/> | No exposure to hepatotoxic chemicals                    |
| <input type="checkbox"/> | No exposure to extreme cold or extreme heat             |

☐ \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Duration of Physical Activity Restriction: \_\_\_\_\_

• ***Light Duty Work***

If the employee is unable to perform his/her normal duties with the above physical activity restriction, please notify the Regional Environmental Health and Safety Manager. EARTH TECH provides light duty work assignments whenever possible for employees with physical activity restrictions.

• ***Medically Unable to Work***

If the employee is unable to be placed in any assignment consistent with his/her physical activity restrictions as described above, please notify the Regional Environmental Health and Safety Manager. EARTH TECH assists employees unable to work due to injury or illness in obtaining needed medical care and other benefits available to them.

Regional EHS Manager: \_\_\_\_\_

Phone: \_\_\_\_\_



## CURRENT EMPLOYEE LISTING

[illegible]

Exposure Categories	Field (HAZWOPER)
Combo (Field & Asbestos)	
Field & Lead	
Field & DOT (Commercial Drivers License)	

# EHS CONTACT LISTING

Loc. Code	Org. Code	Address	Telephone	Facsimile	Primary Contact	Secondary Contact